

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SAMUEL KATZ, individually and on behalf of all)	
others similarly situated)	
)	
Plaintiff,)	Case No. 1:22-cv-05277
)	
v.)	Judge Robert W. Gettleman
)	Magistrate Judge Maria Valdez
ALLIED FIRST BANK, SB,)	
)	
Defendant.)	

DECLARATION OF RICHARD SABATINO

I, Richard Sabatino, do hereby declare as follows:

1. My name is Richard Sabatino and I am over the age of eighteen (18) years and duly qualified to execute this declaration.
2. I am the Chief Executive Officer, sole member, and sole employee of Consumer Nsight LLC ("Consumer Nsight").
3. I make this Declaration based upon my personal knowledge of the matters contained herein and my review of Consumer Nsight's business records kept in the normal course of its business and documents filed in the above-captioned lawsuit.
4. Consumer Nsight is a Florida limited liability company with its principal place of business in Boca Raton, Florida.
5. Consumer Nsight is not a telemarketing firm. Consumer Nsight does not make, dial, or otherwise initiate telemarketing calls.
6. Rather, Consumer Nsight provided advertising consultant services to Allied First Bank, SB ("Allied First") via Craig Mattson. Part of those services included consulting services for live contact telephone call transfers from a call center to Allied First representatives.

7. Consumer Nsight has never had a written contractual agreement with Allied First, and Consumer Nsight has never made, dialed, or otherwise initiated any telemarketing calls for on behalf of Allied First.

8. On January 28, 2022, I sent a proposal, via email from Florida, to Craig Mattson at Allied First for live contact call transfers to Allied First for individuals interested in mortgage refinances (the "Proposal").

9. At all times Consumer Nsight provided services to Allied First, via Craig Mattson, pursuant to the Proposal (from February 2022 to April 2022), the services Consumer Nsight provided pursuant to the Proposal were only provided to an Allied First branch located in Arizona to which live contact telephone call transfers were transferred.

10. Consumer Nsight had a relationship with Iconic Results LLC ("Iconic"), a call center located in Arizona, which Consumer Nsight engaged in connection with the Proposal. Other than Iconic, Consumer Nsight did not engage any vendors to perform any services with respect to the Proposal. Consumer Nsight has never had a written contractual agreement with Iconic.

11. In connection with the Proposal, as part of any live contact call transfers from Iconic to Allied First, after connecting with the called party and obtaining certain information from the called party, Iconic transferred certain calls to a dedicated direct inward dialing ("DID") routing number provided by Consumer Nsight, which in turn instantaneously transferred the call to Allied First via a DID routing number.

12. Consumer Nsight does not speak with or otherwise have any contact or interaction with the call recipient or the person at Iconic making the call.

13. According to the First Amended Complaint – Class Action (Dkt. No. 26; "FAC") filed by the plaintiff Samuel Katz ("Plaintiff") in the above-captioned lawsuit, Plaintiff alleges he

received several telephone calls to his "residential number," which he describes as being "(207) 802-XXXX." (FAC ¶¶ 3, 20.) He also alleges all calls "came from same Caller ID, 207-203-6083." (*Id.* ¶ 22.)

14. Consumer Nsight did not call the Plaintiff, and Consumer Nsight has never communicated with Plaintiff or attempted to communicate with Plaintiff in any way.

15. Consumer Nsight does not make calls from any phone numbers having a (207) area code. Consumer Nsight has never owned or used the telephone number (207) 203-6083.

16. Based on the records reviewed, Iconic made a telephone call to the phone number (207) 802-1001 on March 7, 2022, the call recipient answered the call, and Iconic subsequently transferred the call to Allied First (via instantaneous transfer through Consumer Nsight's dedicated DID routing number).

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on August 11th, 2025 in Boca Raton, Florida.


Richard Sabatino